

App. No. 09/722,774  
Amendment Dated April 6, 2004  
Reply to Office Action of January 30, 2004

REMARKS

The Office Action mailed January 30, 2004 has been received and the Examiner's comments carefully reviewed. Claims 1-27 were pending in this application before submission of this paper. Claims 1-6, 8-15, 17-24, and 26-27 were rejected by the Office Action. Claims 7, 16 and 25 were objected to, but would be allowable if rewritten in independent form. Claims 28-33 are added and substantially include the limitations of the objected claims and the base claims on which the objected claims rely. No new matter has been added. Claims 1-33 are currently pending in this application. For at least the following reasons, Applicants respectfully submit that the pending claims are in condition for allowance.

Rejection of Claims 1-6, 8-15, 17-24, and 26-27

The Office Action rejected claims 1, 10, and 19 under 35 U.S.C 102(e) as being anticipated by U.S. Patent 6,108,027 issued to *Andrews*. The Office Action rejected Claims 2, 11, and 20 under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 5,828,414 issued to *Perkins*. Claims 3, 4, 12, 13, 21, and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 5,212,772 issued to *Masters*. The Office Action rejected Claims 5, 14, and 23 under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent 6,615,370 issued to *Edwards*. Claims 6, 15, and 24 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of U.S. Patent Re. 31,903 issued to *Faillace*, and further in view of *Edwards*. Claims 8, 17, and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Andrews* in view of *Faillace*, further in view of *Edwards*, and further in view of U.S. Patent 6,106,571 issued to *Maxwell*. Claims 9, 18, and 27 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Maxwell* in view of *Faillace*, further in view of *Bodnar*, and further in view of *Andrews*.

Claim 1 is submitted to be allowable at least because the prior art of record does not disclose, teach, or suggest "responding to the difference information satisfying a size constraint by encoding the difference information with reference to a set of commonly occurring difference values for a type of the data to be compressed," as recited in Applicants' Claim 1.

App. No. 09/722,774  
Amendment Dated April 6, 2004  
Reply to Office Action of January 30, 2004

The Office Action cites *Andrews* at column 1, lines 56-62. *Andrews* is directed to the transmission of a still image. Specifically, *Andrews* teaches that difference information representing the difference between a stored image and a still image is computed and encoded in a format that can be processed at a remote location. The encoded difference information is output for transmission over a communications channel. A second image is constructed from the stored image and the difference information. The second image has a quality higher than the quality of the first image and is stored in the memory. This process is repeated, increasing the resolution of the second image with each iteration until the desired quality is achieved.

Claim 1 recites, "responding to the difference information satisfying a size constraint by encoding the difference information with reference to a set of commonly occurring values for a type of the data to be compressed." The difference information of *Andrews* does not satisfy a size constraint, nor is the difference information encoded with reference to a set of commonly occurring values for a type of the data to be compressed.

Claims 10 and 19 include limitations substantially similar (albeit different in other important ways) to the limitations claimed in Claim 1. As discussed above, Claim 1 is allowable. Thus, Claims 10 and 19 are allowable for at least the same reasons that Claim 1 is allowable, and notice to that effect is solicited.

Claim 9 is submitted to be allowable at least because the prior art of record does not teach "encoding the difference information as an unsigned quantity with reference to a set of commonly occurring stack difference values," for reasons analogous to those explained with regard to Claim 1.

Claims 18 and 27 include limitations substantially similar (albeit different in other important ways) to the limitations claimed in Claim 9. As discussed above, Claim 9 is allowable. Thus, Claims 18 and 27 are allowable for at least the same reasons that Claim 9 is allowable, and notice to that effect is solicited.

Furthermore, dependent Claims 2-8, 11-17 and 20-26 are allowable for at least the same reasons that the base claims on which they rely are allowable, and notice to that effect is solicited.

App. No. 09/722,774  
Amendment Dated April 6, 2004  
Reply to Office Action of January 30, 2004

For at least the foregoing reasons, Claims 1-27 are submitted to be allowable, and notice to that effect is solicited.

**Objection to Claims 7, 16, and 25**

Claims 7, 16, and 25 were objected to as being dependent on a rejected base claim but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Newly added Claims 28-33 substantially include the limitations of Claims 7, 16, and 25, and the limitations of the corresponding base claims. Thus, it is respectfully submitted that Claims 28-33 are proper, and notice to that effect is solicited.

**Summary**

It is respectfully submitted that each of the presently pending claims (Claims 1-33) are in condition for allowance and notification to that effect is requested. The Examiner is invited to contact Applicants' representative at the below-listed telephone number if it is believed that prosecution of this application may be assisted thereby. Although certain arguments regarding patentability are set forth herein, there may be other arguments and reasons why the claimed invention is patentably distinct. Applicants reserve the right to raise these arguments in the future.

Respectfully submitted,

MERCHANT & GOULD P.C.

  
\_\_\_\_\_  
Timothy P. Sullivan  
Registration No. 47,981  
Direct Dial: 206.342.6254  
JJF/ab

MERCHANT & GOULD P.C.  
P. O. Box 2903  
Minneapolis, Minnesota 55402-0903  
206.342.6200

